

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie
Nelson, Tannen Maury, and The
Communications Workers of America,
*On behalf of themselves and other
similarly situated individuals,*

Court File No. 20-cv-01302
(WMW/DTS)

Plaintiffs,

v.

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo *in his
individual and official capacity*;
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity*; Minnesota Department of
Public Safety Commissioner John
Harrington, *in his individual and official
capacity*; Minnesota State Patrol Colonel
Matthew Langer, *in his individual and
official capacity*; and John Does 1-4, *in
their individual and official capacities*,

Defendants.

**MOTION FOR PRELIMINARY INJUNCTION AGAINST THE STATE
DEFENDANTS AND ALL THOSE IN ACTIVE CONCERT OR
PARTICIPATION WITH THEM**

Plaintiffs, on behalf of themselves and other similarly situated individuals, hereby
move for a Preliminary Injunction against Defendants Minnesota Department of Public
Safety Commissioner John Harrington, in his individual and official capacities, and
Minnesota State Patrol Colonel Mathew Langer, in his individual and official capacities,
and their agents, servants, employees and representatives, and all those in active concert or

participation with them, as described in Plaintiffs' contemporaneously-filed Proposed Order. Plaintiffs requests that this Motion be handled in an expedited manner.

This motion is based on Fed. R. Civ. P. 65, 42 U.S.C. § 1983, and the First, Fourth, and Fourteenth Amendments to the United states Constitution, and is supported by the accompanying Memorandum of Law and contemporaneously filed declarations.

Dated: May 5, 2021

/s/ Dulce Foster

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Dated: May 5, 2021

/s/ Kevin Riach

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